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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**
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16 FEDERAL TRADE COMMISSION,

17 Plaintiff,

18 v.

19 AMG SERVICES, INC., *ET AL.*,

20 Defendants, and

21 PARK 269 LLC, *ET AL.*,

22 Relief Defendants.
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Case No.: 2:12-CV-536-GMN-(VCF)

**DEFENDANTS' MOTION FOR LEAVE
TO FILE DOCUMENTS
UNDER SEAL**

1 Pursuant to Local Rule 10-5(b) and the Amended Confidentiality and Protective Order in
2 this case (ECF No. 308), AMG Services, Inc. and MNE Services, Inc. move this court for leave
3 to file under seal the following documents: *Defendants' Reply in Support of Motion for Summary*
4 *Judgment on Count III* ("Reply," ECF No. 512) and accompanying exhibits. In support of this
5 motion, Defendants state as follows:
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7 1. On January 11, 2013, this Court entered an amended protective order permitting
8 parties to designate documents and testimony as confidential, and to submit such information to
9 the Court under seal. (ECF No. 308, at 5 ("[F]or Confidential Information attached to or
10 included in dispositive motions, the moving party(ies) must articulate compelling reasons
11 supported by specific facts demonstrating that sealing the document outweighs the public's
12 interest in disclosure . . .").)

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14 2. The Reply contains numerous references to the exhibits accompanying
15 *Defendants' Opposition to the FTC's Motion for Summary Judgment* (ECF No. 493) and
16 *Defendants' Statement of Disputed Facts in Opposition to the FTC's Motion for Summary*
17 *Judgment* (ECF No. 494).

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19 3. Many of the exhibits accompanying *Defendants' Opposition to the FTC's Motion*
20 *for Summary Judgment* and *Defendants' Statement of Disputed Facts in Opposition to the FTC's*
21 *Motion for Summary Judgment* contain consumer data or business information designated
22 "confidential" by the FTC or defendants.

23 4. Defendants sought, and the Court granted, leave to file these documents under
24 seal. (ECF No. 505.)

25 5. In an abundance of caution, defendants seek leave of Court to file both the Reply
26 and its accompanying exhibits under seal.
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Accordingly, Defendants respectfully ask the Court to grant their motion to file under seal *Defendants' Reply in Support of Motion for Summary Judgment on Count III* and accompanying exhibits.

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: 12-31-2013

Dated: December 20, 2013

/s/ David J. Merrill
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CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that on the 20th day of December 2013, I submitted the foregoing *Defendants' Motion for Leave To File Documents Under Seal* electronically for filing and service with the United States District Court of Nevada. Service of the foregoing document shall be made to all counsel of record via electronic case filing.

/s/ Bradley H. Weidenhammer